

Before the Federal Communications Commission

Comments on RM-11331

I am Larry Langford, the owner of WGTO-AM ,(1Kw day, .035 Kw night DA) a stand alone AM station serving the small community of Cassopolis, Michigan. I am the only station in this community.

I am in favor of improving local service to the many small towns that have one or two stations now. However, I have seen what amounts to a total abuse of FM translators over the years. The FCC for reasons not known to me has allowed religious broadcasters in one part of the country to own and link low power translators all over the country in a virtual network. The original reason for implementation of translators was to provide fill in service for FM stations with unique propagation problems. It somehow evolved into a low power FM national service, controlled by an elite group of major owners and religious networks.

Suggestions were made many years ago to allow translators to be used by AM daytime stations to allow post sunset operation. This move was derailed when the FCC allowed operation of daytime stations using PSA and PSSA authority with output powers ranging down to only a few watts in many cases. Another suggestion was offered to allow AM stations using low power at night to operate translators as long as they did not extend past the day time 5 millivolt contour. This too was shot down as the FCC made it clear that translators were not to be used by AM operators under any circumstances.

If local service was truly the aim of the FCC then why not allow existing AM stations who are in many cases the only local source in a community the tools to improve that service to make it a more profitable operation that in many cases can or would have been the difference between operation and going dark.

The proposal of the petitioner would in fact further harm AM stand alone stations who survive by providing local service, by bringing in yet another broadcaster that would be able to operate very cheaply but provide commercial service that would even at low power unfairly compete with the services of the AM station. The petitioner so much as admits the problem when he states that he purchased a local translator CP in a defensive move for his full power FM in the same town!

The petitioner says that translators would serve to provide local coverage of sports and community meetings. Is this not exactly what small AM stations rely on to stay in business against higher powered FM operations who often ignore the community they are licensed to if they are close to a more lucrative metro? The larger town in fact becomes the defacto "home " of the larger FM station. The licensed community of these FM stations often gets nothing more in the way of "local service" than the mention in the legal ID at the top of the hour.

Those of us that have any experience know that construction and operation of an AM station is far more costly than an FM station, the situation is further exaggerated if the station operates a multi tower pattern.

Many AM stations were forced to build expensive night only directional arrays to provide any form of reasonable service to their communities after dark. It is amazing how a \$200,000 investment for an AM array can be easily undermined by a five watt FM station whose antenna is simply hung on the tallest building in the business district.

If FM translators are allowed to provide local programming, stand alone AM stations should be allowed first crack to get them. The FCC opened the expanded band for AM some time ago under the desire to eliminate some interference. Owners who built the new stations are now behind a movement to abandon the stated course that after five years the old band stations would be shut down. Again the argument is local service. The local service argument always seems to be used as a guise to get action that later results in a situation far removed from the original intent.

Small communities served by AM stations would benefit from allowing the local AM stations to operate translators in simulcast to the parent AM. Any subsequent translators could be operated as local stations

as envisioned by the petitioner as long as the AM station is allowed to compete on the same playing field. Of course such restrictions would only work in communities that have no more than one AM station licensed to it. This would by that rule alone mean that only small communities would get the AM preference and in that way only small towns would be affected, allowing the AM to continue operation as a true local station. As the owner of a stand alone station I do not mind competition at the local level as long as it is done in a fair and equal way. The only thing that keeps my station on air is doing things that appeal to a community of 1500 people who are willing to put up with the shortcomings of AM because it is the only way to get local service.

If I can be run over by a five watt FM operation that can cover the entire town from a 100 foot tower *and* sell commercials, I might as well close my doors.

For the above reasons I cannot support the petitioner's request as he has stated it. I truly want to continue to provide local service. Allowing a commercial based locally programmed translator in my town owned by a new broadcaster would truly ensure local service, but by still only one station, since mine would be off the air!

Larry Langford WGTO-AM

6040 Bishop Street Chicago Illinois 60636 LarryLangford@aol.com

LarryLangford@aol.com